

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

STATE FARM LLOYDS AS SUBROGEE OF §
STEVE WATSON AND LISA WATSON, §

Plaintiff, §

vs. §

INTERLINE BRANDS, INC.; LINX, LTD.; §
AND WATTS PLUMBING TECHNOLOGIES §
(TAIZHOU) CO., LTD., §

Defendants. §

CIVIL ACTION NO. 4:13-CV-033-Y

INTERLINE BRANDS, INC. AND LINX, §
LTD., §

Third-Party Plaintiffs, §

vs. §

WATTS PLUMBING TECHNOLOGIES §
(TAIZHOU) CO., LTD., WATTS WATER §
TECHNOLOGIES, INC., WATTS §
INDUSTRIES, INC., WATTS REGULATOR §
CO., AND WATTS (SHANGHAI) MGT. CO., §
LTD., §

Third-Party Defendants. §

**DEFENDANT WATTS PLUMBING TECHNOLOGIES (TAIZHOU) CO., LTD.'S
MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY
IN SUPPORT OF ITS MOTION(S) TO DISMISS (DOC. 85 & 93)
FOR LACK OF PERSONAL JURISDICTION**

TO THE HONORABLE JUDGE OF SAID COURT:

On a case nearly identical to this case before the Honorable United States District Judge
Jane Boyle, Civil Action No. 3:13-cv-00946-B; *Allstate Insurance Company a/s/o Jason V.*

**DEFENDANT WATTS PLUMBING TECHNOLOGIES (TAIZHOU) CO., LTD.'S
MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY
IN SUPPORT OF ITS MOTION(S) TO DISMISS (DOC. 85 & 93)
FOR LACK OF PERSONAL JURISDICTION**

Yeong, Edde Smith, Betty D. Johnson, Karen Kelly, Michael Goodwin, Dorothy Micklo, Neal Shipon, John Alvin Renee and Barry Lentnek vs. Interline Brands, Inc. and Watts Plumbing Technologies (Taizhou) Co., Ltd. which Defendant Watts Plumbing Technologies (Taizhou) Co., Ltd. (“WPT”) filed its Motion to Dismiss for Lack of Personal Jurisdiction, Motion to Dismiss for Insufficient Service of Process, Motion to Dismiss for Failure to State a Claim Upon Which Relief can be Granted, and Motion for a More Definite Statement to Plaintiffs’ claims and to Defendants Interline Brands, Inc. and Linx, Ltd.’s Third-Party Complaint and Supplemental Third-Party Complaint similar to the ones on file in this Honorable Court (Doc. 85 and 93). On February 5, 2014, Honorable Jane Boyle issued the Opinion attached hereto as Exhibit “A,” granting WPT’s Motion to Dismiss for Lack of Personal Jurisdiction. WPT believes Judge Boyle correctly applied the law to the facts and substantive issues that are before this Honorable Court and would be of assistance.

WHEREFORE, PREMISES CONSIDERED, Defendant WPT requests the Court grant its Motion for Leave to File Supplemental Authority in support of its Motion to Dismiss for Lack of Personal Jurisdiction and for such other and further relief to which it may be entitled.

Respectfully submitted,

/s/ C. Vernon Hartline, Jr.

C. VERNON HARTLINE, JR.

(Attorney in Charge)

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ATTORNEYS FOR DEFENDANT

WATTS PLUMBING TECHNOLOGIES

(TAIZHOU) CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing documents has been forwarded to all known counsel of record in this cause in accordance with the Federal Rules of Civil Procedure on this 6th day of February, 2014.

/s/ C. Vernon Hartline, Jr.